

April 1, 2020

VIA U.S. MAIL and ECF

Hon. Anita B. Brody
United States District Court for the Eastern District of Pennsylvania
James A. Byrne United States Courthouse
601 Market Street, Room 7613
Philadelphia, PA 19106

Re: Fuentes v. Royal Dutch Shell PLC et al., Case No. 18-05174-AB

Hon. Anita B. Brody:

The parties have met and conferred and agree to the attached: (1) Agreement and [Proposed] Order Governing Production of Documents, Including Electronically Stored Information (Exh. A); and (2) [Proposed] Rule 502(d) Stipulated Order Governing the Disclosure of Privileged Information (Exh. B). In keeping with Your Honor's Policies and Procedures, the parties hereby jointly move the Court to enter the proposed orders.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 1, 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Michael L. Schrag